

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Linda Ann Glover,
Debtor,
Linda Ann Glover,
Movant,
vs.
Headlands Residential Series Owner Trust,
Series A, SN Servicing Corporation
and Ronda J. Winnecour, Chapter 13 Trustee,

Bankruptcy No: 19-20069-CMB
Chapter 13

Related to Document No. 120, 125
Docket Document No. 129

MOTION FOR A STATUS CONFERENCE

NOW COMES, the Debtor who respectfully requests a Status Conference who avers:

1. The Chapter 13 Trustee filed a Certificate of Default at Docket No. 118.
2. The Court issued an Order at Document 119 requiring the Debtor to file an Affidavit, Proof of Plan Payment, and an Amended Plan by January 24, 2022.
3. Counsel and the Debtor met on January 20, 2022 and a request was made with the current servicer to open a Loss Mitigation application outside the Portal.
4. This request was a result of engaging discussions with the current servicer about how to proceed since the current loan for the home occupied by the Debtor is in her deceased mother's name.
5. This Court at Docket 125 granted the request to extend time to respond to the Trustee Certificate of Default.
6. The Debtor reports opening the request for Loss Mitigation outside the portal and providing the appropriate documents.
7. Most recently the Servicer denied loss mitigation base on the claim they did not receive the necessary documents.
8. The Debtor maintains she provided all the necessary documents.
9. The Debtor is continuing to make payments to the Trustee.

Wherefore, Petitioner respectfully requests the Court schedule a Status Conference to bring the record current and establish a due/set schedule for all the parties.

Dated: March 28, 2022

Attorney for the Debtor,

/s/ David A. Colecchia, Esquire
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